

*Law Offices of Raymond L. Colón*

MEMBER NEW YORK AND NEW JERSEY BAR

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January 10, 2024

The Honorable P. Kevin Castel  
United States District Court Judge  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, New York 10007

Re: United States v. Juan Orlando Hernandez  
S7 15 CR 379 (PKC)

Dear Judge Castel,

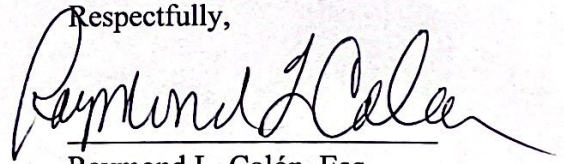
I am respectfully requesting a thirty to forty-five (30-45) day(s) postponement of the upcoming February 5, 2024 trial date in light of continuous testing, diagnosis and treatment for two (2) concurrent and serious pre-existing medical conditions.

These conditions for which I have been receiving medical care for more than twenty-four (24) months have at times impaired my ability to review the voluminous and continuing Government's discovery production(s) with my client.

I am also attaching a letter supplied by Mr. Hernandez Alvarado, wherein he requests that the Court consider his reasons for the adjournment.

I have not consulted with the Government or co-counsels and apologize for the late submission. However, a previously scheduled appointment tomorrow may provide more information, as well as a more detailed prognosis of one of the conditions going forward.

Respectfully,

  
Raymond L. Colón, Esq.

TRULINCS 91441054 - HERNANDEZ, JUAN ORLANDO - Unit: BRO-C-A

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FROM: 91441054  
TO:  
SUBJECT: Letter to Honorable J. Kevin Castel  
DATE: 01/09/2024 07:44:50 AM

January 6, 2024

Honorable Judge Kevin Castel  
District Court, S.D.N.Y.

Dear Judge Castel,

From the beginning of this case, I have not had enough money to pay for a sufficient legal defense for this trial, considering the complexity and the terabytes of material. I have not personally been able to review most of the material due to the difficulties reviewing discovery and producing work products while incarcerated at the MDC. My counsel--do to COVID and other requirements on his time--has not been able to review much of this material either, either alone or with me, or to sufficiently and effectively prepare the defense for trial. In addition, the defense received a large amount of additional material from the Government the last week of December, and the Government has announced that there will be further productions as well, both of which are significantly after the agreed-upon deadline for document production, and neither of which I anticipate the defense being able to sufficiently review as is. I do not have money for additional counsel; in fact, I do not have enough money to continue paying Sabrina Shroff to assist my counsel and I. My life savings were frozen as a result of this prosecution, although even with them it would have been difficult to cover the cost of my defense.

As such I do not anticipate that my counsel and I have enough of a team or enough time to properly prepare for trial on February 5th. I am requesting the Court to appoint me a public defender (i.e. CJA) to help my co-counsel and I prepare for trial; in addition, I am requesting a seven week adjournment of trial to give myself and my new counsel time to prepare. As is, without either the appointment of a public defender (i.e. CJA) or an adjournment in the trial, I do not think that the defense will be able to effectively prepare for trial. I have informed my counsel that I believe we need an additional lawyer, and he concurs.

Respectfully,

/s/ Juan Orlando Hernandez  
91441054

